Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Technology Transitions Policy Task Force	)	GN Docket No. 13-5
Seeks Comment On Potential Trials	)	

REPLY COMMENTS OF NEXGEN GLOBAL TECHNOLOGIES, LLC

NexGen Global Technologies, LLC ("NexGen") submits these reply comments in response to the Commission's Public Notice in the aforementioned docket.

NexGen has developed products and technologies for real time transmission of photos, video and text for law enforcement and first responder purposes. NexGen's solution is a complement to text-to-911, and has the capability to accelerate and scale NG-911 services, with features and functionalities that can enhance public safety. NexGen's MMES (multimedia emergency services) technology is a hybrid SMS/MMS/IP solution. It can be deployed by PSAPs now, irrespective whether the existing infrastructure is analog or digital.

NexGen's system is a cloud-based technology, which allows a cell phone user to call and speak to a 9-1-1 operator, at which time the caller receives notification on his/her mobile phone, to send in photos, video and text to the Emergency Communications Center (from his/her mobile phone). Once received, the 9-1-1 operator would be able to immediately forward the photos, video or text (and any pertinent biographical information such as height, weight or description), to all law enforcement personnel listed in the control panel -- all in real time.

No special software or app is required on the mobile device, and cell phone users can use any wireless carrier. The technology interconnects across all cell phones and wireless devices, and as a stand-alone system easily integrates into any existing communication center without costly IT hardware and software changes or additions. The system can be easily installed and all personnel trained on its use in minutes.

NexGen's technology can dramatically accelerate deployment of multimedia emergency service (MMES) (in particular photos and video), without the anticipated R&D or infrastructure cost, and time delay, associated with MMES in a pure IP environment.[1] NexGen's solution for the delivery of photos, video and text for public safety is available now. It is also IP-compatible, and thus can complement an eventual NG911 solution that includes MMES.[2] NexGen successfully completed Beta Testing of its NexGen 9-1-1 technology with the University of Central Florida Police Department 9-1-1 Communications Center, serving the 2nd largest University in the nation.

The core infrastructure of NexGen's Multimedia Incident Retrieval (MIR) System is built with interoperability on both IP based and cellular radio 3G and 4G LTE architectures. With this being the case, the NexGen MIR System currently works as an over-the-top application on both legacy and IP based networks and can easily be adapted for interoperability on IP Multimedia Subsystem (IMS) and Rich Communication Service (RCS) based networks. NexGen is actively developing APIs to allow for connectivity of its application to such networks.

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[1] For a more comprehensive review of NexGen's technologies, please see our letter dated 02/27/2013 in PS Dockets 12-333, 11-153 and 10-255, at: http://apps.fcc.gov/ecfs/document/view?id=7022125902.

[2] In earlier FCC proceedings, commenters noted the substantial time it could take before anticipated deployment of NG911 multimedia capabilities. For example 4G Americas reported, *"implementation in origination networks is not expected to begin until three or four years."* Even where and when emergency services become available, *"[t]hey may not for some time provide full multimedia services."* See 4G Americas Technical Report filed on 12/13/2012 in PS Dockets 12-333, 11-153 and 10-255, at page 17. Accordingly we reiterate that our technology capabilities are available now.

NexGen is developing a module for longitude / latitude (x/y) coordinates.[3] We anticipate that this will be deployable in the same user-friendly manner as our photos, video and text solution, on existing analog or digital infrastructure.

Commenters in this proceeding have commented on the relative merits, timing and appropriateness of NG911 trials. In this filing, we take no position on these issues. Having said this, whether and/or when such trials ultimately proceed, on either a regulatory or commercial basis, we are hopeful that they would include testing of new technologies such as MMES. The Commission has previously iterated the importance of including MMES (multimedia emergency services) such as video and photos as part of an NG911 solution.[4] Also, we agree with other commenters, that trials that extend beyond "all IP" NG911 services have the potential to provide valuable information given technological transitions over time.[5]

As the Commission continues to develop policies with respect to NG911 for public safety, we respectfully request that the Commission remain cognizant that MMES capabilities (to transmit photos, video and text) are available now. In our view, the inclusion of MMES in eventual NG911 trials (whether commercial or regulatory) would

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[3] See footnote 1.

[4] See Chairman Genachowski statement on 12/6/2012, *"We will also take additional steps in this area next year, including… addressing other aspects of Next Generation 911 such as enabling transmission of photos and videos to 9-1-1 centers."* At http://www.fcc.gov/document/chairman-genachowski-announces-commitments-accelerate-text-911.

[5] See for example filing of Intrado in GN Docket 13-5 dated 7/8/2013, at p. 4. See http://apps.fcc.gov/ecfs/document/view?id=7520929120.

provide the Commission and the public safety community with valuable information in

the effort to deliver enhanced services and incorporate MMES as part of an NG911

solution.

Respectfully submitted,

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August 6, 2013